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Representing the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAELEAH MARIA GUIDA, and
LAURA VELREE GUIDA,

Defendants.

Case No.: 2:18-mj-00955-NJK

**STIPULATION TO CONTINUE
PRELIMINARY HEARING DATE
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United States Attorney, Susan Cushman, Assistant United States Attorney, counsel for the United States of America and Adam Gill, Esq., counsel for defendant Jaeleah Maria Guida and Lance Hendron, Esq. Counsel for defendant Laura Velree Guida:

THAT THE PRELIMINARY HEARING CURRENTLY SCHEDULED FOR December 20, 2016, at 4:00 p.m. before U.S. Magistrate Judge Koppe be vacated and set to a time convenient for the Court, but no earlier than 45 days from the current setting.

This stipulation is entered into for the following reasons:

1. The government will provide counsel for each defendant with limited Rule 16 Discovery in order to facilitate a pre-indictment resolution. Counsel for each

defendant requests an opportunity to review the discovery and discuss it with his respective client prior to a preliminary hearing or an indictment.

2. Defense counsel and counsel for the government agree to the continuance.
3. The defendants are not detained and agree to the continuance.
4. Denial of this request for continuance could result in a miscarriage of justice.
5. The additional time requested by this Stipulation is excludable in computing the time from the filing of the criminal complaint through which the government must assert an criminal Information or seek an Indictment by the Grand Jury pursuant to the Speedy Trial Act, Title 18, United States Code Section 3161(h)(7)(A), when considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B) and 3161(h)(7)(B)(iv).
6. This is the first request for a continuance.

Dated this 13th day of December 2018.

Respectfully Submitted,

DAYLE ELIESON
United States Attorney

/s/

SUSAN CUSHMAN
Assistant United States Attorney

/s/

ADAM GILL
Counsel for defendant Jaeleah Guida

/s/

LANCE HENDRON
Counsel for defendant Laura Guida

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,)

4 Plaintiff,)

5 vs.)

6 JAELEAH MARIA GUIDA, and)
7 LAURA VELREE GUIDA,)

8 Defendants.)

Case No.: 2:18-mj-00955-NJK

**FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER**

9 FINDINGS OF FACT

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
11 Court finds that:

- 12 1. The preliminary hearing in this matter, currently set for December 20,
13 20, 2018. The parties agree to a continuance of the preliminary hearing
14 in an effort to facilitate a pre-indictment resolution of the matter.
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- 16 2. The government will provide counsel for each defendant with limited Rule 16
17 Discovery in order to facilitate a pre-indictment resolution. Counsel for each
18 defendant requests an opportunity to review the discovery and discuss it with
19 his respective client prior to a preliminary hearing or an indictment.
- 20 3. Both counsel for the defendants and counsel for the government agree to the
21 continuance.
- 22 4. The defendants are not detained and agree to the continuance.
- 23 5. The additional time requested by this Stipulation is excludable in computing
24 the time within which the trial herein must commence pursuant to the Speedy

1 Trial Act, Title 18, United States Code Section 3161(h)(7)(A), when
2 considering the factors under Title 18, United States Code, Sections
3 3161(h)(7)(B) and 3161(h)(7)(B)(iv).

4 6. This is the first request to continue the preliminary hearing.

5 For all of the above-stated reasons, the end of justice would best be served by a
6 continuance of the preliminary hearing.

7 ORDER

8 IT IS ORDERED that the preliminary hearing currently scheduled for
9 December 20, 2018, at 4:00 p.m. be vacated and continued to February 12, 2019,
10 at 4:00 p.m., in Courtroom 3C.

11 DATED this 13th day of December 2018.

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14 HONORABLE NANCY J. KOPPE
15 UNITED STATES MAGISTRATE JUDGE
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